State of Alaska

DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES

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The National Institute of Standards and Technology Weights and Measures Division Laws and Metric Group 100 Bureau Drive MS 2000 Gaithersburg, MD 20899-2000

We are unable to attend the forum to update the FPLA laws for the voluntary use of metric only labeling. The State of Alaska is in full support if this change if value comparison issues can be resolved. Since the origin of regulations of Section 4 of Fair Packaging and Labeling Act all efforts have led to the removal or modification of conflicting regulations. We view this forum as a necessary part of that ongoing commitment, to promote regulations in the United States that are compatible not only within our borders, but also with other countries. Consistency of regulations is a concern of private enterprise, but should also be one of regulatory agencies. It was noted that the 1967 FPLA specified that the quantity disclosures be made in the customary American inch/pound system of measurement. A contrast to the changing times. The State of Alaska Statutes require no changes as the inch/pound system and the ("SI metric system") are jointly recognized for commercial purposes in the State.

Metric-only labeling could become accepted by the public in a standard pack format. A 425 gram can of vegetables would become recognizable after a period of time, just as 750 ml bottle of alcohol has been accepted in the liquor industries.

The effects of metric-only labeling on random weight packages as it is linked to "unit price" is a matter of concern

We are very interested in the issues to be discussed and the recommendations for resolving the value comparison issues.

Thank you for the opportunity to comment.

Sincerely,

Aves D. Thompson